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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91215566
Party	Defendant Springbot, LLC
Correspondence Address	JOHN M NADING DLA PIPER LLP (US) 500 8TH ST NW WASHINGTON, DC 20004-2131 UNITED STATES Ann.Ford@dlapiper.com,Ryan.Compton@dlapiper.com,dctrademarks@dlapiper.com
Submission	Stipulated/Consent Motion to Extend
Filer's Name	John M. Nading
Filer's e-mail	Ann.Ford@dlapiper.com,John.Nading@dlapiper.com,Ryan.Compton@dlapiper.com,Ashley.Joyce@dlapiper.com,dctrademarks@dlapiper.com,linda@lindamcal eer.com
Signature	/John M. Nading/
Date	05/08/2015
Attachments	SPRINGBOT Opp. No. 91215566 -- Consent Motion for 90-Day EOT of Pending Case Deadlines.pdf(120898 bytes)

In the matter of Service Mark
Application Serial No. 85/871,678
Mark: SPRINGBOT
Filed: March 8, 2013
Published: September 24, 2013

Opposition No. 91215566

Commissioner for Trademarks
Post Office Box 1451
Alexandria, Virginia 22313-1451

Springbot, LLC (“Applicant”), by and through the undersigned counsel, together with Opposer Bottle Rocket Corp. (“Opposer”), submit this Consented Motion for a Ninety-Day Extension of the Close of the Discovery Period and Re-Set All Remaining Case Deadlines with the Trademark Trial and Appeal Board (“Board”), respectfully requesting that the Board grant an extension of time through and including August 26, 2015 for the Close of the Discovery Period, and that all subsequent case deadlines be re-set by ninety days, pursuant to TBMP § 509.01.

The new case deadlines would be as follows:

Discovery Period to Close:	August 26, 2015
Plaintiff Pretrial Disclosures:	October 10, 2015
Plaintiff's 30-Day Trial Period Ends:	November 24, 2015
Defendant's Pretrial Disclosures:	December 9, 2015
Defendant's 30-Day Trial Period Ends:	January 23, 2016
Plaintiff's Rebuttal Disclosures:	February 7, 2016
Plaintiff's 15-Day Rebuttal Period Ends:	March 8, 2016

The deadline for the Close of the Discovery Period is May 28, 2015. The Parties have engaged in written discovery, and additional time is needed for the Parties to complete discovery. On May 7, 2015, Applicant secured the express consent of Opposer, as confirmed by its attorney Linda S. McAleer, to this Consented Motion and for the extension requested herein.

The Parties respectfully submit that this Consented Motion is not made for the purpose of unduly delaying proceedings before the Board.

WHEREFORE, in light of the foregoing, the Parties have shown good cause as to why the instant Consented Motion should be granted. As such, the Parties request that further appropriate action be taken in these proceedings, including the granting of an extension of the deadline for the Close of the Discovery Period through and including August 26, 2015, and that all subsequent case deadlines be re-set by ninety days accordingly.

Respectfully submitted,

Dated: May 8, 2015

By: /s/ John M. Nading
Ann K. Ford
Ryan C. Compton
John M. Nading
Ashley H. Joyce
DLA PIPER LLP (US)
500 Eighth Street, N.W.
Washington, D.C. 20004
Tel. 202-799-4000
Fax 202-799-5000

Attorneys for Applicant Springbot, LLC

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing **CONSENTED MOTION FOR A NINETY-DAY EXTENSION OF THE CLOSE OF THE DISCOVERY PERIOD AND RE-SET ALL REMAINING CASE DEADLINES** was served via electronic mail, as agreed to by the Parties, to Opposer's counsel of record:

Linda S. McAleer
The Law Offices of Linda S. McAleer
1434 5th Ave.
San Diego, California 92101
linda@lindamcaleer.com

this 8th day of May, 2015.

/s/ John M. Nading

John M. Nading

Attorney for Applicant